

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:24mj03338 Goodman

UNITED STATES OF AMERICA

v.

ARNAU GEFFRARD,

Defendant.

FILED BY KAN D.C.

**Jul 2, 2024**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - Miami

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
4. Did this matter involve the participation of or consultation now Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No

Respectfully submitted,

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

By:

/s/ Elizabeth Hannah

Elizabeth Hannah  
Assistant United States Attorney  
Court ID No. A5503171  
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Southern District of Florida

United States of America

v.

ARNAU GEFFRARD,

*Defendant.*

Case No. 1:24mj03338 Goodman

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2, 2024 in the county of Miami-Dade in the  
Southern District of Florida, the defendant(s) violated:

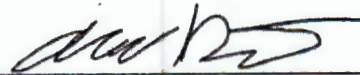
*Code Section*  
31 U.S.C. § 5332(a)

*Offense Description*  
Bulk cash smuggling.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.



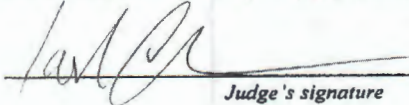
*Complainant's signature*

Alan Barnett, Special Agent, HSI

*Printed name and title*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time.

Date: 7/2/24



*Judge's signature*

City and state: Miami, Florida

Honorable Jonathan Goodman, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT**

I, Alan Barnett, being duly sworn, hereby depose and state the following:

**INTRODUCTION**

1. I am a Special Agent with Homeland Security Investigations (“HSI”) and have been so employed since 2020. As a Special Agent, my responsibilities include, conducting investigations of money laundering, manufacturing, distributing or possession of controlled substances, importation of controlled substances, smuggling of goods into the United States, and related offenses.

2. I have been trained in conducting investigations related to narcotics and other contraband smuggling, interdiction, and distribution activities. I am currently assigned to the Border Enforcement Security Taskforce, where I conduct investigations related to violations of Titles 8, 18, 19, 21 and 31 of the United States Code.

3. This Affidavit is submitted in support of a criminal complaint that charges ARNAU GEFFRARD (“GEFFRARD”) with knowingly concealing more than ten thousand dollars (\$10,000) in United States currency, specifically, approximately seventy-one thousand forty dollars (\$71,040.00) in United States currency, and transporting and attempting to transport such currency from a place inside the United States to a place outside of the United States, in violation of Title 31, United States Code, Section 5332(a).

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the criminal complaint against GEFFRARD, it does not contain all the information known to me and other law enforcement officers involved in this investigation. The facts and information contained in this affidavit are based on my personal knowledge and



observations, as well as information received in my official capacity from other individuals, including other law enforcement officers and people with knowledge of the case.

**PROBABLE CAUSE**

5. On July 2, 2024, the defendant GEFFRARD, attempted to depart Miami International Airport aboard American Airlines Flight AA 819 to Toussaint Louverture International Airport Port-au-Prince, Haiti. United States Customs and Border Protection ("CBP") Officers conducted an outbound customs examination and field interview of GEFFRARD as he was attempting to board the plane. CBP Officers asked GEFFRARD if he had any currency to declare. GEFFRARD verbally stated that he was traveling with \$6,000.00 U.S. dollars.

6. GEFFRARD then completed a written customs declaration via the pre-printed CBP 0207/0909 Form stating he was in possession of six thousand dollars (\$6,000.00) in United States currency. GEFFRARD stated to CBP Officers that he knows that if he were to travel with more than \$10,000.00 that he would have to declare it.

7. CBP officers took an oral binding declaration of GEFFRARD's carry-on luggage. GEFFRARD took responsibility of all his belongings.

8. CBP officers then went to inspect GEFFRARD's carry-on luggage and GEFFRARD pulled his luggage away from the CBP officers. CBP officers went again to inspect GEFFRARD's luggage and discovered two plastic bags concealed in clothing containing money. The total amount of money discovered by CBP Officers was \$71,040.00 U.S. dollars.

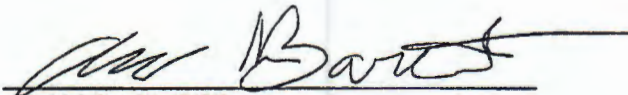
9. GEFFRARD was read his *Miranda* Rights and he agreed to speak to law enforcement. Post-*Miranda*, GEFFRARD admitted to being in possession of \$71,040.00 U.S. dollars in United States currency. GEFFRARD admitted that the currency found in his luggage

had been concealed. GEFFRARD admitted to lying to CBP officers about not having more than \$10,000.00 to declare.

**CONCLUSION**

10. Based on the forgoing, I respectfully submit that there is probable cause to support that on or about July 2, 2024, **ARNAU GEFFRARD** knowingly concealed more than ten thousand dollars (\$10,000) in United States currency, and attempted to transport or transfer such currency or monetary instruments from a place within the United States to a place outside of the United States in violation of Title 31, United States Code, Section 5332(a).

**FURTHER AFFIANT SAYETH NAUGHT.**

  
\_\_\_\_\_  
ALAN BARNETT  
SPECIAL AGENT  
HOMELAND SECURITY INVESTIGATION

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1  
by Face Time this 2nd day of July 2024.

  
\_\_\_\_\_  
HONORABLE JONATHAN GOODMAN  
UNITED STATES MAGISTRATE JUDGE